

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

<p>JUDITH YARRINGTON, ELIZABETH CRAGAN, JULIA CRAIGHEAD and CAROLYN GREEN, individually, and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>SOLVAY PHARMACEUTICALS, INC.,</p> <p style="text-align: center;">Defendant.</p>	<p>No. 09-cv-2261-RHK/RLE</p> <p><b><u>SUPPLEMENTAL DECLARATION OF LEIGH ANNA THOMURE OF KINSELLA MEDIA, LLC</u></b></p>
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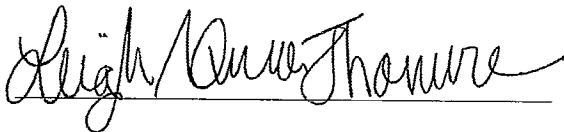
I, Leigh Anna Thomure, being duly sworn, hereby declare as follows:

- 1) I am a Project Manager at Kinsella Media, LLC (“Kinsella Media”), an advertising and legal notification consulting firm in Washington, D.C. specializing in the design and implementation of class action and bankruptcy notification programs to reach unidentified putative class members primarily in consumer and mass tort litigation. Kinsella Media, through its President Katherine Kinsella, has previously submitted declarations (executed September 2, 2009, and January 29, 2010) outlining my firm’s credentials. This declaration is based upon my personal knowledge and upon information provided by Plaintiffs’ Counsel and my staff. The information is of a type reasonably relied upon in the fields of advertising, media and communications. My business address is 2120 L Street, NW, Suite 860, Washington, D.C. 20037. My telephone number is (202) 686-4111.

- 2) I submit this declaration at the request of Plaintiffs' Counsel to describe the implementation of the Supplemental Notice Program outlined in my previously submitted declaration, executed on February 12, 2010.
- 3) The paid media program utilized all the websites for the publications used in the initial Notice Program, as well as publication in nationally distributed newspapers: *USA Today*, the *New York Times*, and the *Wall Street Journal*.
- 4) The print media was executed using: (1) a 1/6 page (5.37" x 6.9") advertisement on Monday, February 22, 2010 in *USA Today*, which has a daily circulation of 1,833,413; (b) a 1/6 page (5.37" x 6.9") advertisement on Monday, February 22, 2010 in the *New York Times*, which has a daily circulation of 1,039,031; and a 1/6 page (5.37" x 6.9") advertisement on Monday, February 22, 2010 in the *Wall Street Journal*, which has a daily circulation of 1,717,362. The Internet media was executed by placing banner advertisements on all the websites for the publications used in the initial Notice Program advising people of the changes and directing them to the Settlement website to review the modified long notice. The banners were of two dimensions (728 x 90 pixels and 300 x 250 pixels) beginning according to the varying start dates outlined below:
  - a) americanprofile.com: February 17, 2010 at approximately 10:00 a.m.;
  - b) bhg.com (*Better Homes and Gardens* website): February 19, 2010 at approximately 12:01 a.m.;
  - c) health.com: February 18, 2010 at approximately 11:45 a.m.;

- d) lhj.com (*Ladies Home Journal* website): February 19, 2010 at approximately 12:01 a.m.;
  - e) parade.com: February 16, 2010 between 2 p.m. and 4 p.m.;
  - f) prevention.com: February 16, 2010 between 2 p.m. and 4 p.m.;
  - g) usaweekend.com: February 17, 2010 at approximately 8:40 a.m.; and
  - h) womansday.com: February 17, 2010 at approximately 5:30 p.m.
- 5) Attached hereto as Exhibit A is an Implementation Report detailing the page numbers of the print advertisements and the delivered gross impressions<sup>1</sup> of the Internet banner ads.

I declare under penalty of perjury that the foregoing is true and correct.



Leigh Anna Thomure

March 11, 2010

<sup>1</sup> Gross impressions refer to the viewing of a page or viewing of an ad. This assumes that the page or ad images completely download and the user views the page or ads on the page.